

**ATTACHMENT A**  
**Statement of Facts**

*The United States and the Defendant, JOSE ANTONIO JARAMILLO, stipulate and agree that if this case proceeded to trial, the United States would prove the facts set forth below beyond a reasonable doubt. They further stipulate and agree that these are not all of the facts that the United States would prove if this case proceeded to trial.*

At all relevant times to this case, the Defendant, **JOSE ANTONIO JARAMILLO** ("**JARAMILLO**"), was a citizen of the United States and a resident of Lusby (Calvert County), Maryland.

From at least December 2014 through at least July 2015, **JARAMILLO**, who was posing as a teenage male named "Tommy James," "Thomas James," or "Thomas James Jones," used email, applications on cellular phones (e.g., Kik Messenger ("Kik")), and social media sites (e.g., Facebook) to persuade, induce, entice, and coerce more than five female victims between the ages of 13 and 16 to send him sexually explicit images of themselves over the Internet. The following are representative examples of **JARAMILLO**'s communications with the victims.

**Victim A**

Review of the "Tommy James" Facebook account used by **JARAMILLO** revealed that **JARAMILLO** communicated with Victim A (a 15-year-old female) using the "Thomas James" persona between at least December 2014 and May 2015. The chat conversations between Victim A and **JARAMILLO** were sexually-explicit and included requests from "Thomas James" that Victim A perform sexual acts on herself and send images of those sexual acts to **JARAMILLO**. Victim A told **JARAMILLO**, who was posing as "Tommy James," that she was 15 years old and **JARAMILLO** told Victim A that he was 17 years old.

For example, on April 12, 2015, **JARAMILLO**, as "Thomas James," engaged in a sexually-explicit chat with Victim A via Facebook. He directed Victim A to touch her vagina and wrote "did babygurls pussy feel good? has it ever felt that hot or wet? you like me telling you what to do? I wanted u to cum for me . . . if you had keep rubbing you would have cum." Subsequently, **JARAMILLO** asked Victim A if she was "horny" and to show him her "pussy from behind." In addition, he wrote "I want to eat you out." **JARAMILLO** again directed Victim A to rub her vagina and to put two fingers inside of her vagina. Thereafter, **JARAMILLO** asked if placing fingers in her vagina hurt and if she liked it when it hurt. **JARAMILLO** then asked Victim A "can baby try 3 . . . you have three fingers inside?" Afterward, **JARAMILLO** wrote, "I want to see ur finger in ur tight cunt." In response, Victim A transmitted a picture of her fingers in her vagina. Later in the chat, **JARAMILLO** stated that he wanted a video and directed Victim A to "move them in and out fast." In response, Victim A sent **JARAMILLO** a video and **JARAMILLO** wrote, "mmmm I love that so much." **JARAMILLO** then asked Victim A to send a longer video, writing "make it longer lover." Victim A responded by sending an additional video. Victim A then asked if she could stop because it hurt. **JARAMILLO** responded, "yes baby. did it hurt" and "oh im sorry. wish i could kiss it."

**JARAMILLO** engaged in several other sexually-explicit chats with Victim A on Facebook similar to those described in the foregoing paragraphs and requested and received sexually-explicit images from Victim A, including on April 22, April, 23, April 26, May 2, May 3, May 10, and May 21, 2015. As described in the preceding paragraphs, Victim A sent to **JARAMILLO** via Facebook visual depictions of herself engaged in sexually-explicit conduct, as defined in 18 U.S.C. § 2256(2)(A). Therefore, the sexually explicit images were transported or transmitted in or affecting interstate or foreign commerce.

#### Victim B

Review of the “Tommy James” Facebook account used by **JARAMILLO** revealed that **JARAMILLO** communicated with Victim B (a 15-year-old female) using the “Thomas James” persona between at least June 2015 and July 2015. The chats between Victim B and **JARAMILLO** were sexually-explicit and included requests from “Thomas James” that Victim B perform sexual acts on herself and send sexually-explicit images to **JARAMILLO**. Victim B told **JARAMILLO**, who was posing as “Tommy James,” that she was 15 years old and **JARAMILLO** told Victim B that he was 16 years old.

For example, on July 1, 2015, during a chat conversation with Victim B on Facebook, **JARAMILLO**, who was posing as “Thomas James,” wrote, “I m dying to see.” In response, Victim B transmitted to **JARAMILLO** via Facebook a “selfie” (i.e., a picture of herself she took) exposing her bare breasts. **JARAMILLO** responded with sexually-explicit comments and then requested, “please lower your pjs a little more for me.” Afterwards, **JARAMILLO** instructed Victim B to masturbate and asked if he could sleep in Victim B’s bed, receive oral sex from Victim B, and have sex with Victim B. **JARAMILLO** also requested additional nude photos of Victim B, specifically of her buttocks.

Over the next several days, **JARAMILLO** initiated several similar, sexually-explicit chat conversations with Victim B. On July 5, 2015, **JARAMILLO** wrote via Facebook, that he had an erection, that he wanted to put his penis in Victim B’s mouth, and directed Victim B to masturbate. Victim B initially refused to send additional photos and asked **JARAMILLO**, who was posing as “Thomas James,” why he was requesting so many pictures. After Victim B’s questions about **JARAMILLO**’s repeated requests for pictures, **JARAMILLO** stopped the chat session “to do chores.” When **JARAMILLO** reinitiated the chat conversation, **JARAMILLO** asked for pictures of Victim B’s vagina and Victim B complied. **JARAMILLO** then asked Victim B to send a clearer picture. In response, Victim B sent another picture of her genitalia. **JARAMILLO** then asked if he could perform oral sex on Victim B, directed Victim B to tell him “I want you to lick my pussy,” and directed Victim B to masturbate.

**JARAMILLO** engaged in several other sexually-explicit chat conversations with Victim B similar to those described in the foregoing paragraphs, including on July 2, July 3, July 4, and July 6, 2015. As described in the preceding paragraphs, Victim B sent to **JARAMILLO** via Facebook visual depictions of herself engaged in sexually-explicit conduct, as defined in 18 U.S.C. § 2256(2)(A). Therefore, the sexually explicit images were transported or transmitted in or affecting interstate or foreign commerce.

Victim C

Review of the "Tommy James" Facebook account used by **JARAMILLO** revealed that **JARAMILLO** communicated with Victim C (a 15-year-old female) using the "Thomas James" persona between at least February 2015 and March 2015. The chat conversations between Victim C and **JARAMILLO** were sexually-explicit and included requests from **JARAMILLO** that Victim C perform sexual acts on herself and send images of those sexual acts to **JARAMILLO**.

For example, on February 19, 2015, **JARAMILLO**, posing as "Thomas James," wrote, "how big are you perfect breasts?" "perfect for my mouth," "id tease your nipples with the tip of my tongue." "the kiss your breasts, alternating between the two," "then open my mouth wide and start sucking them," "then id reach down," "and rub between ur legs," "slip my hand in ur pants," "id touch ur pussy through your panties," and "rub ur pussy til your panties get moist [sic]." Subsequently, Victim C wrote, "Moves my hand to where your d is and starts rubbing." **JARAMILLO** responded, "to my cock baby," "rub it," "hands feel good on my cock," and "I want to see u." When Victim C asked what **JARAMILLO** wanted to see, **JARAMILLO** replied, "ur breasts" and Victim C transmitted via Facebook a picture of herself wearing only panties and fully exposing her breasts. Afterward, **JARAMILLO** asked "can I see ur pussy" and instructed her to "please clear you history when u log off ok baby." Afterward, **JARAMILLO** asked, "do you rub ur pussy" and directed Victim C to "touch it now." **JARAMILLO** continued, "baby im dying to see it," "put your finger inside," "deep baby," "deeper ....in and out baby," and "mmmmmmmmmmmm rub ur clit." **JARAMILLO** then described to Victim C where her clitoris was located, "open your lips and look at the top of your pussy," "like a little bud at the very top," "rub it baby," and "open your legs wider." Subsequently, **JARAMILLO** wrote, "show me where u want my cock." Victim C responded by sending **JARAMILLO** via Facebook a video of her exposed vagina. **JARAMILLO** responded, "rub ur clit," "put ur finger in your cunt and get it wet...then rub ur clit," and "lick ur finger." **JARAMILLO** then sent Victim C a picture of a female's exposed vagina without pubic hair and wrote, "look at the top of this pussy pic.. see her clit."

On March 2, 2015, **JARAMILLO**, posing as "Thomas James," engaged in another sexually-explicit chat conversation with Victim C. "Thomas James" wrote, "I want to taste you," "I want you," and "can I see my babygurl." In response, Victim C sent a clothed picture of herself. Subsequently, **JARAMILLO** wrote, "may I see babygurls perfect breasts," and Victim C sent a picture with her breasts exposed. "Thomas James" responded, "mmmmmmmm," "may I suck?" "may I eat your pussy?" "may I see it lover," "show me lover," "im hard for my baby," "mmmm show me baby.please," "dying to see sweet lover." Victim C then sent a picture of her exposed vagina with her fingers touching her clitoris and labia.

**JARAMILLO** engaged in several other sexually-explicit chat conversations with Victim C similar to those described in the foregoing paragraphs and requested and received sexually-explicit images from Victim C, including on February 21, March 5, March 6, March 11, March 12, and March 13, 2015. As described in the preceding paragraphs, Victim C sent to **JARAMILLO** via Facebook visual depictions of herself engaged in sexually-explicit conduct, as defined in 18 U.S.C. § 2256(2)(A). Therefore, the sexually explicit images were transported or transmitted in or affecting interstate or foreign commerce.

**Victim D**

Review of the “Tommy James” Facebook account used by **JARAMILLO** revealed that **JARAMILLO** communicated with Victim D (a 14-year-old female) using the “Thomas James” persona between at least April 2015 and June 2015. The chat conversations between Victim D and **JARAMILLO** were sexually-explicit and included requests from **JARAMILLO** that Victim D perform sexual acts on herself and send images of those sexual acts to **JARAMILLO**. **JARAMILLO** received at least 170 images and five videos of Victim D on Facebook.

For example, on April 22, 2015, **JARAMILLO**, posing as “Thomas James,” described wanting to give Victim D, “gentle kisses on [her] soft lips,” “lightly bite [her] lip,” “wrap [his] arms around [her],” and “Slide [his] hand down [her] waist.” Victim D subsequently transmitted to **JARAMILLO** a picture of herself with her shirt pulled up exposing her breasts. In response, **JARAMILLO** wrote, “I want to tease your hard nipples with my tongue,” “let me suck them as I rub between ur legs,” and “slipping my hand over your panties.” Later in the conversation, Victim D transmitted multiple pictures to **JARAMILLO**, including pictures of her exposed breasts, her vagina, her exposed buttocks, and her lying on her back fully exposing her genitalia. After encouragement from **JARAMILLO**, Victim D sent additional pictures of her inserting her fingers into her vagina. Afterward, **JARAMILLO** directed Victim D to “put two inside babygurl.” When Victim D wrote that she needed to urinate, **JARAMILLO** asked, “can i watch. lol.” Victim D asked, “Do u wanna see? Or no? I need to know before I go pee.” **JARAMILLO** replied, “yum . . . yesss.” Subsequently, Victim D sent a video of her exposed vagina. **JARAMILLO** responded, “mmmmm I love it.” A few minutes later, **JARAMILLO** wrote, “show me how you wnt to be. you could choose anything darling.” Later, Victim D wrote, “Yea I’m gonna go take some nudes I’ll send them to u in a few mins I got an urge to shove my finger in my pussy it’s a better urge then cutting your making me so happy yay you make me feel happy you make me feel good.” After additional encouragement, Victim D transmitted to **JARAMILLO** an up close picture of her index finger penetrating her vagina.

On May 27, 2015, while engaged in another sexually-explicit chat session with **JARAMILLO**, Victim D wrote, “I actually don’t like doing it I just say yes an do [it] for you I [act] like it doesnt bother me when it really does.” The sexually-explicit chat session between **JARAMILLO** and Victim D thereafter continued.

**JARAMILLO** engaged in numerous other sexually-explicit chat conversations with Victim D similar to those described in the foregoing paragraphs and requested and received sexually-explicit images from Victim D, including on April 25, April 26, April 27 (involving a request from **JARAMILLO** that Victim D insert a toothbrush into her vagina), May 3 (involving an additional request that Victim D send **JARAMILLO** a video of Victim D urinating), May 6, May 26 (involving a request from **JARAMILLO** that Victim D insert a toothbrush into her vagina), and June 2, 2015. Victim D sent visual depictions of herself engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), to **JARAMILLO** via Facebook. Therefore, the sexually explicit images were transported or transmitted in or affecting interstate or foreign commerce.

**Other Victims**

**JARAMILLO** engaged or attempted to engage in sexually-explicit chat conversations with at least ten other victims between the ages of 13 and 16. Of those ten other victims, at least three sent visual depictions of themselves engaged in sexually-explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), to **JARAMILLO** via his email account and/or the "Tommy James" Facebook account. Therefore, the sexually explicit images were transported or transmitted in or affecting interstate or foreign commerce.

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I have read this Statement of Facts and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it.

27 May 2016  
Date

Jose A. Jaramillo  
Jose Antonio Jaramillo

I am Jose Antonio Jaramillo's attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is an informed and voluntary one.

5/27/16  
Date

Lisa Lunt  
Lisa Lunt, Esq.